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May 27, 1988

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VIA FEDERAL EXPRESS

Audrey Bimby, Esquire Office of Regional Counsel U.S. Environmental Protection Agency Region VII 726 Minnesota Avenue Kansas City, Kansas 66101

> Re: Sheller-Globe Corporation Keokuk Division RCRA VII-88-H-0010

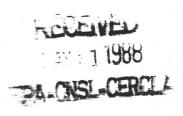
Dear Ms. Bimby:

During our meeting with you on May 4, 1988, Sheller-Globe Corporation agreed to provide additional information concerning the handling of waste from mold cleaning operations at its Keokuk, Iowa plant. The information provided herein is submitted as part of informal settlement negotiations in an attempt to resolve the above-referenced matter without the necessity for an administrative hearing.

We had initially agreed to provide this information to you by May 27, 1988. Pursuant to our telephone conversation on May 26 concerning EPA inspection activities, however, we agreed to submit the information for delivery to you on the next business day, May 31, 1988. It is our understanding that the inspection of Sheller-Globe's Keokuk facility by an EPA contractor which is scheduled for June 2, 1988 is for the purpose of addressing the planned closure of Sheller-Globe's hazardous waste storage facility, an issue unrelated to this proceeding. Information obtained during the course of that inspection is not intended by EPA to be used in this proceeding.

As indicated in Sheller-Globe's Answer and in discussions on May 4, waste from the mold cleaning operation are combined with nonhazardous waste from other plant operations prior to discharge into a pond on plant property. As indicated in the attached information, waste from the mold cleaning vat were combined with





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wastewater from several other operations. (Mold cleaning waste are no longer discharged through the in-plant system, but are instead disposed of off site, as has been stated in previous correspondence.) The mold cleaning waste was discharged approximately 4 to 6 times per year with a total volume of approximately 300 gallons at the time of each discharge. The initial drainage system into which the vat waste were discharged has an average daily flow of approximately 19,320 gallons per day, not including stormwater flow. Those wastes are mixed with flow from other drainage systems in the plant, having a total combined average flow of approximately 120,800 gallons per day, excluding stormwater flow. The flow from all of the drainage systems are combined before discharge or drainage into the on-site pond. flow rates given herein reflect current operations and are based on recent flow measurements. It is possible that past wastewater flows were greater.

We reiterate that there are no data or other evidence prior to April 1987 that would demonstrate that the mold cleaning waste was a hazardous waste and Sheller-Globe had no reason at the time to suspect that it was hazardous. All of the mold cleaning wastes have been disposed of off-site at a permitted hazardous waste disposal facility since February 1987. Assuming for the sake of argument, however, that the mold cleaning wastes were Subpart C wastes during the time they were discharged via the plant drainage system, those wastes were combined with a large volume of nonhazardous waste. The ratio of a small amount of Subpart C waste, approximately 300 gallons, to a very large amount of nonhazardous waste, averaging approximately 140,120 gallons per day, indicates that the mixture of those wastes could not, under any reasonable assumption, be considered to exhibit Subpart C characteristics. Thus, under 40 C.F.R. 261.3(a)(2)(iii), the resulting mixture of waste discharged into the on-site pond was not a hazardous waste.

We hope that this information will be helpful and will facilitate resolution of this matter. Please let me know if you have any questions. We look forward to hearing from you.

Diana C. Dutton

CC: Lawrence E. King, Esq.
Mr. Gregory Sautter
Mr. Andy Edgar
Jeffrey C. Glass, Esq.

SHELLER GLOBE CORPORATION Keokuk Plant Wastewater Flow

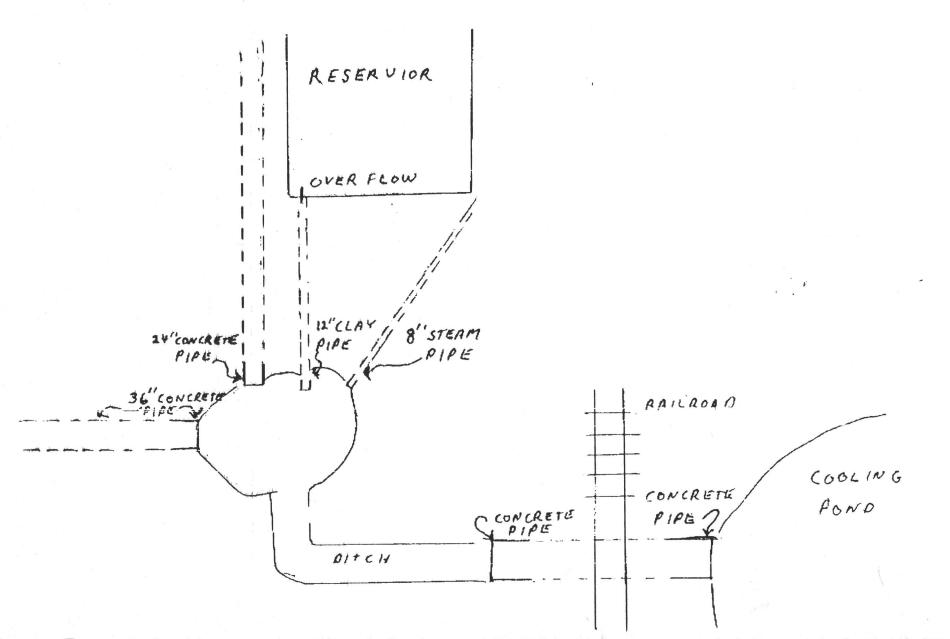
Wastewaters from the Mold Cleaning Operation were discharged to a 24 inch sewer which runs underneath the Keokuk Plant. This 24 inch sewer collects roof drainage and wastewaters from process operations in the plant. These wastewaters are discharged from this 24 inch sewer at a point where three (3) other sewers discharge. The wastewaters from all four (4) sewers combine and flow approximately 100 feet via a ditch into a concrete sewer which discharges into the cooling pond. The following is a list of major sources of water for these sewers.

00	gers.	Discharge Volume				
	Source	Min. GPM	Max. <u>GPM</u>	Avg. GPM	Daily GPD	Frequency
		24 inch C	oncrete	Sewer		
		Storm &	Proces	S		
1.	Mold Cleaning Operation					
	Mold Cleaner Vat - 300 galNot Discharged					
	Mold Cleaner Rinse Tank-300	gal.				Weekly
	Mold Cleaner Rinse Hose	0	5		1200	2-4 hr/d
2.	Instrument Pad Operations					
۷.	Pad Washer #1 - 500 gal.				500	Daily
	Pad Washer #1 Rinse	0	35	4	5760	16-24 hr/d
	Pad Washer #2 - 500 gal.				500	Daily
	Pad Washer #2 Rinse	0	35	4	4800	12-20 hr/d
	Pad Washer #3 - 500 gal.				500	Daily
	Pad Washer #3 Rinse	0	35	4	5760	16-24 hr/d
	Trim Water Cutters 1,2,&3	0	35		300	Intermittent
2	Floor Drainage					
3.	Floor Drainage 4 Sump Pumps	0	35			Intermittent
4.	Roof Drainage					
	Approx. 600,000 Ft. ²					
	375,000 Gals. @ 1 in. Rain	fall				
5.	Rubber Extruder Area					
	Floor Sump	0	35			Intermittent
		36 Inch C	Concrete	·		
		Storm &	Proces	S		
1.	Rubber Extrusion					
	Rubber Cooling	60	7.5	70	100800	24 hr/d
2 -	Roof Drainage		a in Company Statement and			
7	(surface area unknown)					
3.	Storm Water Drainage					
	(drainage area unknown)					
	*	12 Inc	h Clay			
		Storm & F	rocess	Flow		
1.	Overflow from Reservoir	1.0	40	14	20000	24 hr/d
		8 Inch		-1		
		Storm & H	rocess	Flow		

1. Boiler Room Drainage

(drainage area unknown)

SHELLER - GLOBE CORP. KEOKUK PLANT SEWER DISCHARGE DIAGRAM



量的整个目的 是是是基础的证据



May 27, 1988

Ms. Diana C. Dutton Akin, Gump, Strauss, Hauer & Feld 4100 First City Center 1700 Pacific Avenue Dallas, Texas 75201-4618

Dear Ms. Dutton:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Walter D. Hunnicutt

SHELLER GLOBE CORPORATION
Plant Manager/Reokuk Padded

WDH:SC